

Sage Legal LLC

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February 11, 2026

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Marcia M. Henry, U.S.M.J.
225 Cadman Plaza East
Courtroom 13C South
Brooklyn, NY 11201-1804

Re: Nettles v. Zoom 34 LLC, *et al.*
Case No.: 1:25-cv-334 (CBA) (MMH)

Dear Judge Henry:

This firm represents the Defendant Zoom 34 LLC (“Defendant”) in the above-referenced case. The Defendant writes to respectfully request an extension of time of two (2) weeks, until February 25, 2026, to file a stipulation of voluntary dismissal in this case as required by this Court’s Order dated January 12, 2025.

Pursuant to ¶ II(B) of this Court’s Individual Motion Practices, Defendant respectfully submits that:

- (i) the original deadline to file a stipulation of voluntary dismissal is set forth *supra*;
- (ii) the reason for the request is because the parties reached a further settlement in principle that will fully resolve the case without the need for Plaintiff to pursue a motion for default judgment against the remaining Defendants and this Defendant needs additional time to revise the parties’ settlement agreement to that effect in light of depositions taking place tomorrow and Friday in one case as well as a reply due today in another case.
- (iii) there have been no previous requests for an extension of this particular deadline;
- (iv) Plaintiff does not consent to this requested extension of time despite your undersigned informing his counsel about my obligations in other cases; and
- (v) Defendant submits that good cause exists based on the foregoing.

Defendant thus respectfully submits that sufficient good cause and excusable neglect exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendant thanks this Court for its time and attention to this case.

Dated: Jamaica, New York
February 11, 2026

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
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